

1 **Marquis Aurbach**
 2 Nick D. Crosby, Esq.
 3 Nevada Bar No. 8996
 4 10001 Park Run Drive
 5 Las Vegas, Nevada 89145
 Telephone: (702) 382-0711
 Facsimile: (702) 382-5816
 ncrosby@maclaw.com
 Attorneys for Defendants

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 ANDREW PALMER KLEIN,

9 Plaintiff,

10 vs.

11 VIMWORLD, INC., a Delaware corporation;
 CREAM, LLC, a Nevada limited liability
 company,

13 Defendants.

Case Number:
 2:25-cv-00100-RFB-MDC

14 **STIPULATION AND ORDER TO**
EXTEND TIME FOR DEFENDANTS
TO FILE RESPONSE TO COMPLAINT
(FIRST REQUEST)

15 It is hereby stipulated between Plaintiff Andrew Palmer Klein (“Plaintiff”), by and
 16 through his attorney of record, Greenberg Gross LLP and Defendants Vimworld, Inc. and
 CREAM, LLC (collectively “Defendants”), by and through their attorney of record, Marquis
 17 Aurbach, that the deadline for Defendants to file their response to Plaintiff’s Complaint be
 18 extended from May 5, 2025 to May 19, 2025.

19 1. Plaintiff filed his Complaint on January 15, 2025.
 20 2. A Waiver of Service of Summons was executed by the parties on March 5,
 21 2025, making the Defendants’ responsive pleading due May 5, 2025.

22 3. Counsel for Defendants starts a United States District Court trial on May 5,
 23 2025 through May 12, 2025 in *Lechner v. LVMPD, et al.*, Case No. 2:19-cv-00638-RFB-
 24 MDC and also has a Ninth Circuit oral argument hearing in *Solomon v. LVMPD, et al.*, Case
 25 No. 23-4166 on May 14, 2025 in Phoenix AZ.

26 4. After consulting with Plaintiff’s counsel, the parties have agreed to extend
 27 the deadline for Defendants to file their response from May 5, 2025 to May 19, 2025.

MARQUIS AURBACH

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1 5. This extension is not an intent to further delay.

2 IT IS SO STIPULATED this 29th day of April, 2025.

3 MARQUIS AURBACH

GREENBERG GROSS LLP

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5 By: s/Nick D. Crosby
Nick D. Crosby, Esq.
Nevada Bar No. 8996
6 10001 Park Run Drive
Las Vegas, Nevada 89145
7 Attorney for Defendants

By: s/Michael A. Burnette
Michael A. Burnette, Esq.
Nevada Bar No. 16210
1980 Festival Plaza Dr., Ste. 730
Las Vegas, Nevada 89135
Attorney for Plaintiff

8
9 **ORDER**

10 IT IS HEREBY ORDERED the deadline for Defendants to file their response is
11 extended from May 5, 2025 to May 19, 2025.

12
13 Hon. Maximiliano D. Couvillier III
14 United States Magistrate Judge
15 Date: 4/30/2025
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MARQUIS AURBACH
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Las Vegas, Nevada 89145
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